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8 and Steve Wolfson

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 Marlon Lorenzo Brown,)
12 Plaintiff,) Case No: 2:17-cv-02396-APG-BNW
13 vs.)
14 City Of Las Vegas, Nevada; Las Vegas)
14 Metropolitan Police Department)
15 (LVMPD); Clark County; Clark County)
15 District Attorney's Office; Steve)
16 WOLFSON; Danae Adams; Bruce Nelson;)
16 Joseph Lombardo; Dante Tromba; Does)
17 and Roes 1-20,)
18 Defendants.)
19

**STIPULATION TO STAY
DISCOVERY**

20 Defendants Clark County, the Clark County District Attorney's Office, and Clark
21 County District Attorney Steve Wolfson (the "County Defendants"); the Las Vegas
22 Metropolitan Police Department and Dante Trombe ("LVMPD Defendants"); and Marlon
23 Lorenzo Brown ("Plaintiff"), hereby stipulate as follows:

24 1) Discovery shall be stayed pending ruling on the County Defendants' and LVMPD
25 Defendants' Motions to Dismiss, [ECF Nos. 101 and 105], subject to potential lifting of the
26 stay upon terms and conditions that the parties and the court deem just;
27 2) A stay is necessary because these pending Motions involve issues of immunity and
28 adequacy of pleading allegations, and resolution of these Motions does not require further

1 discovery. *Pilger v. Mosley*, No. 2:18-cv-00854-JAD-PAL, 2018 WL 5268605, at *2 (D. Nev.
2 Oct. 23, 2018) (“The Supreme Court has squarely held that until the threshold issue of
3 immunity is resolved, discovery should not proceed.”). A stay of discovery at this time will
4 align with Federal Rule of Civil Procedure 1, which declares that the Rules “should be
5 construed, administered, and employed by the court and the parties to secure the just,
6 speedy, and inexpensive determination of every action and proceeding.”

7 3) The discovery stay shall include all discovery previously served but for which no
8 response has been made;

9 4) The parties agree that any responses to any outstanding discovery will be made within
10 fourteen (14) days of the Court's ruling on any applicable Motion to Dismiss; if necessary.

11 5) The parties will submit a new proposed Discovery Plan to the Court within fourteen
12 (14) days of the Court's ruling on the last filed Motion to Dismiss and the stay will be lifted.
13 The new discovery plan will include extended deadlines to designate experts, conduct
14 discovery, and file dispositive motions.

15 DATED this 15th day of July, 2022.

16 | KAEMPFER CROWELL

MCAVOY AMAYA & REVERO

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23 | CLARK COUNTY

IT IS SO ORDERED

24 By: /s Jeffrey S. Rogan
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*Attorney for Defendants Clark
County, the Clark County District
Attorney's Office, and Steve
Wolfson*

DATED: 3:56 pm, July 18, 2022

BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE